

GOTTLIEB, RACKMAN & REISMAN, P.C.

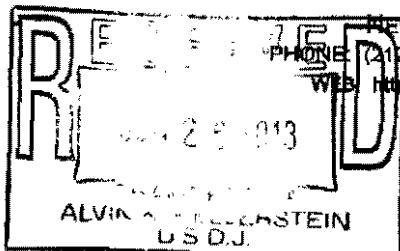
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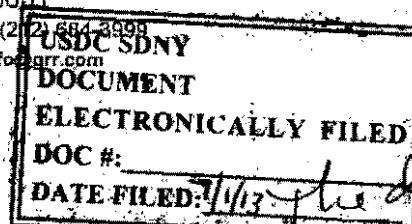
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June 25, 2013

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Honorable Alvin K. Hellerstein
 Room 1050
 United States Courthouse
 500 Pearl Street
 New York, NY 10007

**Re: Knoll, Inc. v. Regency Seating, Inc. et al.
12-cv-0921-AKH**

Dear Judge Hellerstein:

Further to yesterday's hearing in the above referenced matter, enclosed please find the unredacted copy of the document requested by the Court. A redacted copy of the document is also enclosed.

It is Knoll's position that the redacted portions of the document are not in furtherance of any fraud and therefore production should not be ordered, for the following reasons.

First, the document is a privileged document as the writer, Carla Vrsansky, is an attorney at Buchanan Ingersoll who represents Knoll and was writing to Knoll executives and giving legal advice.

Second, the document is dated August 16, 2002, which is at least thirteen months before the filing of the trademark applications in question. Thus, any connection between the information in this e-mail and the filing of the applications is remote and speculative.

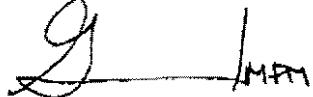
Third, and incorporating our prior arguments to the Court, there is no basis for finding that this document is in furtherance of any fraud.

Honorable Alvin K. Hellerstein
June 25, 2013
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Counsel is available for a phone conference to address this matter.

Respectfully submitted,

GOTTLIEB, RACKMAN & REISMAN, P.C.

A handwritten signature consisting of a stylized 'G' and 'M' followed by 'PM'.

George Gottlieb
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GG/MPM

Encl.

cc: Michael J. Freno, Esq. (via facsimile w/o encls.)
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